

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

State of Minnesota, by its
Attorney General Lori Swanson,

Civil File No. 12-145 RHK/JJK

Plaintiff,

v.

AFFIDAVIT OF LYNN SAINATI

Accretive Health, Inc.,

Defendant.

Lynn Sainati, being first duly sworn on oath, state as follows:

1. My name is Lynn Sainati. I am 41 years old and live in Bloomington, Minnesota. I am a graduate student at the University of Minnesota, where I am pursuing a Masters Degree in sports education. I work part-time as a swim coach, lifeguard, and swim instructor.

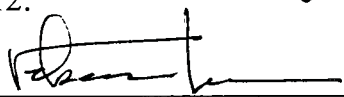
2. On April 19, 2012, I fractured my collar bone while playing kickball as part of a group exercise at the University of Minnesota. I was in intense pain and had the wind knocked out of me and couldn't breathe. The paramedics were called by the first aid folks at the University, and they took me to the Emergency Room at Fairview Southdale. When I arrived at the Emergency Room, the registration department verified my insurance and asked me for my marital status and religion. I thought this was odd. I was then taken to a patient room.

3. A doctor briefly told me about the tests he planned to run. The doctor then left the room. No tests had yet been performed, I was in excruciating pain, and couldn't move. I had not yet been given any pain medication. A man then came into my room and told me that the estimated cost of my visit was approximately \$1,200 and that I was required to pay \$150. The man told me that he needed to get payment right then and asked me how I intended to pay. As a graduate student, I have enormous education expenses and do not have a full time job. I told the man I could not afford to pay \$150. The man told me that he needed to get a payment from me right then in some amount and asked me how I wanted to take care of it. We then haggled over what I could afford to pay, with the man asking me if I could pay half or a quarter. I eventually told him I could afford to pay \$50. I was given the clear impression that I wouldn't get treatment if I didn't pay. Because I could not move and was in debilitating pain, the man had to take my wallet out of my purse and bring it to me. He then ran my credit card. The man then left the room. No one came back for a very long period of time. After a long wait of perhaps an hour, the doctor returned. I told him that I had not yet been given any pain medication. He apologized and gave me pain medication to ease the terrible pain. The medical professionals then took me for an x-ray and an electrocardiogram. Because I landed so hard on my chest, the doctors were concerned that I had blunt force trauma to my cardiovascular area, which is why they felt it necessary to perform the EKG. Eventually, it was determined that I had a hairline fracture to my collar bone. I still

cannot believe that I had to haggle with a finance person in my Emergency Room bed before I was even given any pain medication or any tests.


LYNN SAINATI

Subscribed and sworn to before me
this 2nd day of May,
2012.


Notary Public

